

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

ALEXANDER FRIEDMANN,

Plaintiff,

v.

TONY PARKER, et al,

Defendants.

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Case No. 3:21-CV-00721

WITNESS LIST

Defendants, pursuant to this Court's December 10, 2021, Order to Show Cause (ECF 25), hereby provides the following Witness List for the Hearing on December 15, 2021:

1. Assistant Commissioner Lee Dotson. Mr. Dotson is expected to testify about the American Correctional Association (ACA) standards and that TDOC conforms to those standards. TDOC is ACA accredited. Mr. Dotson also is expected to testify about the initial steps taken to comply with this Court's November 23, 2021, Order and why he believes that those steps did comply with the Order. Also, Mr. Dotson is expected to testify that RMSI is not a "supermax" prison and Unit 1 is not a "supermax" unit.
2. Michael Keys. Mr. Keys is expected to testify as to the 3 different cells that Mr. Friedmann inhabited – the hardened cell ("iron man" cell), the cell in Unit 1 where Mr. Friedmann was moved, and the cell in Unit 4 where Mr. Friedmann is now housed, including descriptions of the amenities that Mr. Friedmann was afforded. Mr. Keys is also expected to testify about Mr. Friedmann's time out of cell to review the materials related to his criminal case, his recreation time out of cell, and his visitation.

3. Warden Tony Mays. Warden Mays is expected to testify about the nature of safekeepers and the need to keep them safe while housed in his facility. Warden Mays is also expected to testify about why general population in Riverbend is not a viable option.
4. Any witness that Plaintiff may call.

Respectfully submitted,

HERBERT H. SLATERY III
Attorney General and Reporter

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been filed electronically on December 14, 2021 and may be accessed through the Court's electronic filing system. The following will receive a copy through the Court's electronic filing system:

Christopher W. Smith
David Randolph Smith
Dominick R. Smith
W. Lyon Chadwick
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S/ Dawn Jordan
DAWN JORDAN
Senior Deputy Attorney General